

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. No. 23-cv-06708
D. Ariz. No. 25-cv-4276

Under Civil Local Rules 7-11 and 79-5(f), Plaintiff moves the Court to consider whether material designated confidential by Uber or third parties associated with Uber should be sealed.

On December 30, 2025, Plaintiff filed her Response in Opposition to Defendants' Motions in Limine which refer to and attach documents that Uber designated "HIGHLY CONFIDENTIAL" and / or "CONFIDENTIAL."

Material To Be Filed Under Seal

The material to be filed under seal is portions Plaintiff's Omnibus Motions in Limine and the attached exhibits.

Document	Description	Designating Party
Portions of Plaintiff's Response in Opposition to Defendants' Motions in Limine	Portions of briefing referring to documents and testimony designated highly confidential and confidential	Uber
Exhibit 2	UBER JCCP MDL 000337623	Uber
Exhibit 3	UBER JCCP MDL 000475307	Uber
Exhibit 4	UBER JCCP MDL 001717430	Uber
Exhibit 5	UBER JCCP MDL 000118664	Uber

Document	Description	Designating Party
Exhibit 6	UBER_JCCP_MDL_002010063	Uber
Exhibit 7	UBER_JCCP_MDL_001319387	Uber
Exhibit 8	Screenshots of video exhibits 1015 and 1016, Heather Childs Deposition June 5, 2025	Uber
Exhibit 9	Andrew Hasbun Deposition Transcript, April 10, 2025	Uber
Exhibit 10	Brooke Anderson Deposition Transcript, May 2, 2025	Uber
Exhibit 11	Hannah Nilles Deposition Transcript, August 7, 2025	Uber
Exhibit 12	UBER_JCCP_MDL_000562614	Uber
Exhibit 13	UBER_JCCP_MDL_001441325	Uber
Exhibit 14	UBER_JCCP_MDL_003340515	Uber
Exhibit 15	UBER_JCCP_MDL_000890205	Uber
Exhibit 16	UBER000205949	Uber
Exhibit 17	UBER_JCCP_MDL_005031659	Uber
Exhibit 18	Valerie Shuping Deposition Transcript, April 18, 2025	Uber
Exhibit 19	UBER_JCCP_MDL_003231342	Uber
Exhibit 20	UBER_JCCP_MDL_001701663	Uber
Exhibit 21	UBER_JCCP_MDL_000122017	Uber
Exhibit 22	Todd Gaddis Deposition Transcript, July 8, 2025	Uber
Exhibit 23	UBER_JCCP_MDL_000108957	Uber
Exhibit 24	UBER_JCCP_MDL_003922272	Uber
Exhibit 25	UBER_JCCP_MDL_000484014	Uber
Exhibit 26	Dara Khosrowshahi Deposition Transcript, July 1, 2025	Uber
Exhibit 27	Roger Kaiser Deposition Transcript, April 22, 2025	Uber
Exhibit 28	UBER_JCCP_MDL_001732337	Uber
Exhibit 29	UBER_JCCP_MDL_001636209	Uber
Exhibit 30	UBER_JCCP_MDL_000898569	Uber
Exhibit 31	Rebecca Payne Deposition Transcript, May 13, 2025	Uber
Exhibit 33	Travis Kalanick Deposition Transcript, July 3, 2025	Uber
Exhibit 34	UBER_JCCP_MDL_004753672	Uber
Exhibit 35	UBER_JCCP_MDL_001711889	Uber
Exhibit 36	UBER_JCCP_MDL_003441012	Uber
Exhibit 37	UBER_JCCP_MDL_000564141	Uber
Exhibit 38	UBER_JCCP_MDL_004216886	Uber
Exhibit 39	UBER_JCCP_MDL_001563463	Uber
Exhibit 40	UBER_JCCP_MDL_001739193	Uber
Exhibit 41	UBER_JCCP_MDL_001100749	Uber
Exhibit 42	UBER_JCCP_MDL_001072809	Uber
Exhibit 43	UBER_JCCP_MDL_000031164	Uber
Exhibit 44	UBER_JCCP_MDL_001773711	Uber
Exhibit 45	UBER_JCCP_MDL_000084521	Uber
Exhibit 46	UBER_JCCP_MDL_004752785	Uber
Exhibit 47	UBER_JCCP_MDL_003040649	Uber
Exhibit 48	Declaration of Todd Gaddis, August 18, 2025	Uber

Document	Description	Designating Party
Exhibit 49	Incident Report Field Convenience Descriptions, March 24, 2025	Uber
Exhibit 50	Defendants' Responses to Plaintiffs' Interrogatories and Requests for Production, August 18, 2025	Uber
Exhibit 51	Katherine McDonald Deposition Transcript, October 7, 2024	Uber
Exhibit 52	Hannah Nilles Deposition Transcript, July 10, 2025	Uber
Exhibit 53	Sunny Wong Deposition Transcript, October 14, 2025	Uber
Exhibit 54	UBER-MDL3084-DFS00159600	Uber
Exhibit 55	UBER-MDL3084-DFS00003713	Uber
Exhibit 56	Transcript of Audio, UBER-MDL3084-DFS00159677	Uber
Exhibit 57	UBER-MDL3084-DFS00003692	Uber
Exhibit 58	Transcript of Audio, UBER-MDL3084-DFS00003741	Uber

Under Local Rule 79-5(f)(3), the designating entities bear the responsibility to establish that all of the designated material is sealable.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Steven D. Cohn in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: December 30, 2025

Respectfully submitted,

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Co-Lead Counsel for Plaintiffs

FILER'S ATTESTATION

I am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I attest that the signatories above concurred in this filing.

Dated: December 30, 2025

By: /s/ Roopal P. Luhana
Roopal P. Luhana